

III. REMARKS

Claims 1, 6, 11, 16, 17, 19 and 23 are amended.

Claims 1, 2, 4-7, 9-13 and 15-23 are patentable under 35 U.S.C. 102(e) over Debbins et al., U.S. Patent No. 6,331,776 ("Debbins"). Claim 1 recites a module located within the intermediate network, the module being configured to receive and process data from the remote network and send a different data to the local network based on the data received from the remote network. Claim 1 further recites that all data transferred between the local network and the remote network passes through the module. Debbins fails to disclose or suggest these features.

Debbins discloses a method for the remote operation and servicing of a magnetic resonance imaging (MRI) system. The method includes establishing a communication connection over a network between the MRI system and the remote facility to provide remote services to the MRI system (Col. 2, L. 33-39). The service system (1010) of Fig. 4 provides remote service to diagnostic systems (1012). The diagnostic systems (1012) are serviced from a centralized service facility (1022) (Col. 9, L. 29-41). As shown in Fig. 4 of Debbins, the diagnostic systems (1012) communicate with the centralized service facility (1022) over a network (1080) (Col. 10, L. 58-60). A plurality of field service units (1024) may be coupled in the service system for transmitting service requests, verifying service status and transmitting service data (Col. 9, L. 29-44). As shown in Fig. 4, the remote service units (1024) also communicate with the centralized service facility (1022) over the network (1080). Remote services include remote monitoring, remote system control, immediate file access from remote locations, remote file storage

and archiving, remote resource pooling, remote recording and remote high speed computations (Col. 9, L. 47-51). A management station (1070) may link more than one medical diagnostic system in a single facility or location (Col. 10, L. 30-36). The management station (1070) is connected to the work station (1072) that is linked to the service facility (1022) via the remote access network (1080) (Col. 10, L. 58-60).

Nowhere does Debbins disclose or suggest a module located within the intermediate network, the module being configured to receive and process data from the remote network and send a different data to the local network based on the data received from the remote network.

The Examiner suggests that the automated service unit (1136) as disclosed at column 13, lines 59-66 of Debbins reads on the module located within the intermediate network as recited in Applicant's claim 1. The Applicant respectfully disagrees. The automated service unit (1136) of Debbins is located within the service facility (1022) and not an intermediate network (Col. 13, L. 59-60). In addition, the automated service unit is not disclosed as being configured to receive and process data from the remote network and send a different data to the local network based on the data received from the remote network as recited in claim 1.

In Debbins, the MRIs, workstations (1072) and field service units (1024) may be linked to service facility (1022) through a remote access network (1080) such as the internet. Data may be exchanged between the diagnostic systems, field service units and the remote service facility (1022) in accordance with Internet Protocol (IP) or Transmission Control Protocol (TCP) (Col. 10, L. 58 - Col. 11, L. 6). Messages, service requests and data are

received at the service facility (1022) through communications port (1082) which transmits this data to the service center processing system (1084) (Col. 11, L. 7-12). Platform (1090) is provided within each diagnostic system (1012) (i.e. the MRI system) and enables a direct interface between the service facility (1022) and the control circuitry of the individual scanners of the diagnostic system (1012) (Col. 11, L. 29-61). As can be seen in Fig. 4, the service facility (1022) is connected directly to the diagnostic equipment (CT system 1016 and MRI system 1014) through communications port (1048, 1032). This is not the same as the module being configured to receive and process data from the remote network and send a different data to the local network based on the data received from the remote network as recited in claim 1.

In addition, in Debbins, prevention of unauthorized access is only disclosed with respect to the service facility through the use of firewalls within the processing system (1084) (Col. 11, L. 62-66). A firewall merely blocks unwanted messages while letting messages that meet a certain criteria to pass right through. Again, this is not the same as receiving and processing data from the remote network and sending a different data to the local network based on the data received from the remote network as called for in claim 1.

Further, nowhere is there any disclosure or suggestion in Debbins of a module as claimed in claim 1, that is located within the intermediate network, where all data transferred between the local network and the remote network passes through the module. As described above, the automated service unit (1136) of Debbins is located within the service facility (1022) and not an intermediate network (Col. 13, L. 59-60). Furthermore, the

automated service unit only responds to certain service requests. There is no disclosure or suggestion in Debbins that all data must pass through the automated service unit.

Therefore claim 1 is patentable over Debbins. Claims 6 and 11 are patentable over Debbins for reasons similar to those described above with respect to claim 1. Claims 2, 4, 5, 7, 9, 10, 12, 13 and 15-23 depend from claims 1, 6 and 11. While these dependent claims each contain their own patentable subject matter, these claims are allowable at least because they depend from claims 1, 6 and 11 which are allowable.

Furthermore, claim 6 recites an equipment diagnostic system for monitoring the health of equipment within the local network, the equipment diagnostic monitoring system being located within the intermediate network. Nowhere is an equipment diagnostic system for monitoring the health of equipment within the local network where the equipment diagnostic monitoring system is located in an intermediate network disclosed or suggested in Debbins. The Examiner suggests this is disclosed in Debbins in Fig. 4 and at column 9, lines 45-51. However, Debbins discloses at column 9, lines 29-55 and in Fig. 4 that the diagnostic systems (1012) may be positioned in a single location or facility such as medical facility (1020), or may be remote from one another as shown in the case of ultrasound system (1018) of Fig. 4. Nowhere are the diagnostic systems (1012) of Debbins disclosed or suggested as monitoring the health of equipment or being located in an intermediate network. Therefore, claim 6 is patentable over Debbins for this additional reason. This argument also applies equally to claims 4 and 11.

Claim 18 recites that the equipment diagnostic monitor system sends an alert to a predetermined entity when the analysis of

tool data indicates that the at least one item is operating outside of a predetermined performance range. Nowhere is this disclosed or suggested in Debbins. The Examiner suggests that this feature is disclosed in Debbins at column 13, line 59 through column 14, line 4, column 14, lines 18-37, and column 15, lines 11-29. The Applicant respectfully disagrees. These cited passages merely disclose that "other network or communications schemes may be provided for enabling the service facility to communicate and exchange data and messages with diagnostic systems and remote service units" and that a scheduler module coordinates the service requests, messaging and reporting. Therefore, claim 18 is patentable over Debbins.

Claims 20, 21, 22 and 23 further recite a semiconductor tool. Debbins does not disclose or suggest any type of semiconductor tool. Debbins is concerned solely with medical diagnostic equipment such as MRIs and CT systems (Col. 5, L. 8-11; Fig. 4). Therefore, claims 21, 22 and 23 are patentable over Debbins.

Claims 3, 8 and 14 are patentable under 35 U.S.C. 103(a) over Debbins in view of Reid et al., U.S. Patent No. 6,182,226 ("Reid"). For the reasons described above, Debbins does not disclose or suggest the features of claims 1, 6 and 11 from which claims 3, 8 and 14 depend.

Reid also fails to disclose or suggest the features of claims 1, 6 and 11. As described in the response to the prior office action, the arguments of which are incorporated herein by reference in their entirety, Reid does not suggest or disclose a module located within the intermediate network as in claim 1 of the present application. In Reid, there is an internal network (32), which is broken up into regions, that is connected to an external network (36). Communications between these two networks

is restricted by firewall (34). Communication between internal network (32) and server 42 is also restricted by firewall (34). As such, in Reid, the communication between two networks (32, 36) does not pass through an intermediate network as claimed in claim 1 of the present application. In addition, nowhere is it disclosed in Reid that the module is configured to receive and process data from the remote network and send a different data to the local network based on the data received from the remote network. Reid simply does not disclose or suggest an intermediate network or a module located within the intermediate network as called for in Applicant's claim 1.

Neither Debbins nor Reid, individually or in combination, disclose or suggest a module located within the intermediate network, the module being configured to receive and process data from the remote network and send a different data to the local network based on the data received from the remote network as recited in claim 1. Therefore, Claim 1 is patentable over Debbins in view of Reid.


Claims 6 and 11 are patentable over the combination of Debbins and Reid for reasons similar to those described above with respect to claim 1. Claims 3, 8 and 14 depend from claims 1, 6 and 11. While these dependent claims each contain their own patentable subject matter, these claims are allowable at least because they depend from claims 1, 6 and 11 which are allowable.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should

any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$ 910.00 is enclosed for a one-month extension of time and the RCE fee. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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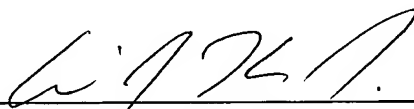
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